

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

RENEE L. MCCRAY

*

Plaintiff

*

**No. 13-26131
Chapter 13**

v.

*

WELLS FARGO BANK, N.A. *et al.*

*

Adv. No. 13-00710

*

Judge Nancy V. Alquist

Defendants

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* * * * *

**RESPONSE OF WELLS FARGO BANK, N.A. TO THE
"OBJECTION AND MOTION TO DENY DEFENDANT'S MOTION TO DISMISS"
FILED BY RENEE L. McCRAY**

Wells Fargo Bank, N.A. ("Wells Fargo") hereby responds to the "Objection and Motion to Deny Defendant's Motion to Dismiss" (the "Objection and Motion") filed by Renee L. McCray ("McCray"), as follows:

1. On September 30, 2014 this Court entered an Order (signed September 29, 2014) dismissing McCray's adversary proceeding for the reason that McCray lacks standing to bring the complaint, and for the additional reason that the Amended Complaint failed to state a claim upon which relief can be granted. Specifically, the Court found that Wells Fargo is the holder of the promissory note and it is entitled to enforce the note.

2. On October 14, 2014 McCray filed her Objection and Motion containing an indecipherable "Correction of Mistakes, Deed Corrections" and "Offer of Settlement." It appears that McCray filed the Objection and Motion in furtherance of yet another invalid debt elimination scheme on her part. Wells Fargo cannot reasonably understand what McCray is attempting to do, and what she is requesting Wells Fargo and the Court to do, except that she is

apparently seeking an Order which would "reconvey to the Plaintiff" the Deed of Trust to "Plaintiff's property." To the extent that the Objection and Motion could be interpreted by the Court as some form of motion for reconsideration of the dismissal of the adversary proceeding, such request should be denied. McCray presents no coherent argument, no good reason and no new facts which would justify disturbance of the Order dismissing the adversary proceeding.

Wherefore, Wells Fargo requests that the Court strike the Objection and Motion on the grounds that it is not a proper or necessary pleading in the case, and there are no open motions or issues to which the Objection or Motion is responsive. In the alternative, to the extent that the Objection and Motion is interpreted as a motion for reconsideration of the dismissal of the adversary proceeding, such request for reconsideration should be denied.

/s/ Michael S. Barranco
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Attorney for Defendant,
Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2014, a copy of the foregoing Response to the Objection and Motion to Deny Defendant's Motion to Dismiss was filed via CM/ECF and served by U.S. Mail, postage prepaid, first class to the following:

Renee L. McCray
109 Edgewood Street
Baltimore, Maryland 21229

/s/ Michael S. Barranco
Michael S. Barranco